



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

MAR 02 2016

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article No.: 7014 1200 0000 6124 4983

IN THE MATTER OF:

**HollyFrontier El Dorado Refining LLC
1401 Douglas Road
El Dorado, Kansas 67042**

ATTENTION:

Skipp Kistler – Vice President and Refinery Manager

Section 114 Order to Provide Information Pursuant to the Clean Air Act

The United States Environmental Protection Agency requires HollyFrontier El Dorado Refining LLC, f/k/a/ Frontier El Dorado Refining LLC (HollyFrontier) to submit certain information about your facility at 1401 Douglas Road, El Dorado, Kansas.

The EPA is issuing this Order pursuant to Section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a), which authorizes the Administrator of EPA to require the submission of information. HollyFrontier is hereby ordered to provide complete, accurate and truthful information in response to the questions in this Order. Pursuant to Section 113 of the Act, 42 U.S.C. § 7413, EPA may commence a civil or criminal action for failure to provide complete, accurate and truthful information pursuant to an Order issued under Section 114. **HollyFrontier must provide all of the information requested, in accordance with the questions in Attachment 1, within thirty (30) days of its receipt of this Order.**

HollyFrontier owns and operates emission sources at its El Dorado Refining facility. We are requesting this information to determine whether HollyFrontier's emission sources are complying with the Clean Air Act. The Administrator has delegated this authority to the Director of the Air and Waste Management Division, EPA Region 7.

You must send all requested information to the following:

Bill Peterson
Air Permitting and Compliance Branch
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219



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Terri Dykes, Attorney-Advisor
US EPA – Air Enforcement Division
Mail Code 2242-A
1200 Pennsylvania Avenue, NW
Washington, D.C. 20002

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim.

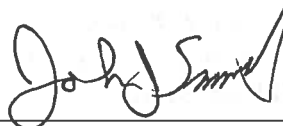
We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. §3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To the extent that you respond with non-electronic media, to aid in our electronic record keeping efforts, please provide such Information and Documents without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

You should direct any questions about this Order to Julie L. Murray at (913) 551-7448.

March 1, 2016

Date



John Smith
Deputy Division Director
Air and Waste Management Division

cc: Byron F. Taylor, Sidley Austin LLP

ATTACHMENT 1

1. Provide a copy of all written correspondence dated within the period commencing May 31, 2014 and continuing until January 31, 2016 that refers or relates to the West (main) Flare (B-1302) or the East (backup) Flare (B-1303) between HollyFrontier and the Kansas Department of Health and Environment (KDHE) regarding and responding to any claim for exception to regulatory emissions limitations imposed under the CAA or SIP made by HollyFrontier pursuant to K.A.R. 28-19-11.
2. For the period commencing August 1, 2010 and continuing until January 31, 2016, provide all information referring or relating to visible emissions and opacity emanating from the West (main) Flare (B-1302) or the East (backup) Flare (B-1303). Your response should include, but not be limited to: (a) results of any Method 9 or Method 22 readings per NSPS Appendix A; (b) photographs; notes or other documentation describing said emissions; (c) descriptions and observations of flare operation; (d) flame characterization; (e) steps taken to correct or control said emissions; (f) the name of any person observing said emissions, and whether that person is Method 9 or Method 22 certified; and (g) any complaints regarding emissions received from the public.
3. For the period commencing on August 1, 2010 and continuing until January 31, 2016, identify each hour of the day when the water seal on the West (main) Flare (B-1302) was breached. The term "breached" shall be interpreted as any time vent gas breaks through the water seal and enters the flare for purposes of being combusted by the flare. Vent gas shall be interpreted as defined in EPA's June 18, 2014 information request. Applicable documents submitted per EPA's June 18, 2014 request do not have to be resubmitted.
4. For the period commencing on August 1, 2010 and continuing until January 31, 2016, identify each hour of the day when the water seal on the East (backup) Flare (B-1303) was breached. The term "breached" shall be interpreted as any time vent gas breaks through the water seal and enters the flare for purposes of being combusted by the flare. Vent gas shall be interpreted as defined in EPA's June 18, 2014 information request. Applicable documents submitted per EPA's June 18, 2014 request do not have to be resubmitted.
5. For those periods specifically identified in Attachment 2 to this request, identify by name each individual process unit, the start date, start time, end date and end time, that the refinery process unit sent off gas to the refinery flare header as a result of startup of the process unit (i.e. do not generically identify these periods as "SSM", but provide this information specifically to the startup of the process unit).
6. For those periods specifically identified in Attachment 2 to this request, identify by name each individual process unit, the start date, start time, end date and end time, that the refinery process unit sent off gas to the refinery flare header as a result of shutdown of the process unit (i.e. do not generically identify these periods as "SSM", but provide this information specifically to the shutdown of the process unit).

7. For those periods specifically identified in Attachment 2 to this request, identify by name each individual process unit, the start date, start time, end date and end time, that the refinery process unit sent off gas to the refinery flare header as a result of a malfunction of the process unit (i.e. do not generically identify these periods as "SSM", but provide this information specifically to a malfunction of the process unit). The meaning of "Malfunction" shall be as defined in 40 C.F.R. §60.2.
8. HollyFrontier's Flare Management Plan (FMP) dated November 10, 2015 states the baseline flow evaluation to the individual flare header systems has been conducted using flow data from the GE flow meter. (See Section 3.3, page 3-4 of the FMP). Provide all of the flow data used in the baseline flow evaluation including any data used to determine the alternative baselines described in the FMP.
9. Provide a description, including any necessary sample calculations to show how the alternative baseline flow rates were determined and reported in HollyFrontier's FMP dated November 10, 2015 for each of the following alternative baseline scenarios (see Section 3.3, page 3-4 of the FMP):
 - a. The FGRU system was offline for maintenance or similar situations (baseline 1,750,000 scfd);
 - b. Hydrogen imbalance, where excess sweet hydrogen from HGU2 and/or HGU3 will be sent to the flare via the 20 inch sweet hydrogen header bypass line (baseline 1,750,000 scfd);
 - c. Hydrogen imbalance, where excess sweet hydrogen from CRU2 will be sent to the flare via the 6 inch excess sweet fuel gas/Hydrogen bypass line (baseline 1,750,000 scfd);
 - d. Fuel gas imbalance, where excess sweet fuel gas from the LPGT will be sent to the flare via the 6 inch excess sweet fuel gas/H₂ bypass line (baseline 1,750,000 scfd).
10. HollyFrontier's FMP dated November 10, 2015 states that the span on the SOLA II monitor is 0-100% (see Table 2-7, page 2-11). Provide the span value in the units of ppmv to clarify whether the 100% represents a concentration value of 100% sulfur (1,000,000 ppmv) as opposed to 100% of the range of the monitor.
11. For the West Flare flow meter (General Electric FI 1348), the low span sulfur monitor (Siemens MAXUM II) and the high span sulfur monitor (SOLA II), provide a copy of the manufacturer's calibration, maintenance, and quality assurance procedures.
12. Produce all documents that refer or relate to the capacity of the West (main) Flare (B-1302) and the East (backup) Flare (B-1303) and whether those flares are adequately designed, sized, and operated to meet applicable emissions limits under the reasonably anticipated range of operating conditions at this facility. Applicable documents submitted per EPA's June 18, 2014 request do not have to be resubmitted.

Attachment 2

Start Date	End Date
8/28/2010	9/5/2010
9/2/2010	9/2/2010
9/15/2010	9/15/2010
10/3/2010	10/10/2010
11/1/2010	11/4/2010
6/8/2011	6/8/2011
8/29/2011	9/2/2011
3/23/2012	4/8/2012
11/10/2012	11/10/2012
4/27/2013	5/22/2013
5/8/2013	5/8/2013
1/13/2014	1/13/2014
4/21/2014	4/22/2014
4/24/2014	4/24/2014
4/25/2014	4/25/2014
7/17/2014	7/17/2014
9/1/2014	9/26/2014
10/1/2014	10/1/2014
10/10/2014	10/10/2014
10/18/2014	10/18/2014
11/12/2014	11/12/2014
11/17/2014	11/17/2014
1/7/2015	1/18/2015
2/3/2015	2/10/2015
4/5/2015	4/12/2015
5/13/2015	5/18/2015
6/7/2015	6/14/2015

